



Counsel Appear On The Following Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NIA MUJADADI-TURAN,

Plaintiff,

v.

MOTOROLA MOBILITY, LLC;
METROPOLITAN LIFE INSURANCE
COMPANY,

Defendants.

CASE NO. 5:15-CV-2752 (EJD)

**FURTHER JOINT STIPULATION TO
CONTINUE DEADLINE FOR
DEFENDANTS MOTOROLA MOBILITY,
LLC AND METROPOLITAN LIFE
INSURANCE COMPANY TO RESPOND
TO PLAINTIFF'S COMPLAINT**

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JOINT STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan ("Plaintiff") and Defendants Motorola Mobility, LLC ("Motorola") and Metropolitan Life Insurance Company ("MetLife") (Plaintiff, Motorola, and MetLife are referred to as the "Parties"), hereby jointly stipulate to a seventh extension of time for Motorola and MetLife to respond to Plaintiff's Complaint. Pursuant to the Parties Agreement, the deadline for Motorola and MetLife to file their respective responses to Plaintiff's Complaint will be continued from February 8, 2016 to March 7, 2016. To support this Stipulation, the Parties agree and stipulate as follows:

1. On June 18, 2015, Plaintiff initiated the present action and MetLife in the United States District Court for the Northern District of California. (See ECF, Doc. No. 1.)

2. MetLife was served with the Summons and Complaint on June 26, 2015.

3. Motorola was served with the Summons and Complaint on July 21, 2015.

4. The Parties submitted stipulations extending the deadline for MetLife to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14, 20, 25, 29, 37, 39.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 22, 28, 31, 38, 40.)

5. The Parties submitted stipulations extending the deadline for Motorola to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21, 24, 30, 37, 39.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23, 27, 32, 38, 40.)

6. Since the last request, the Parties have been engaged in conversations regarding either scheduling a settlement conference with a Magistrate Judge or retaining a private mediator. While no firm date for a settlement conference or mediation has been set at this time, the Parties are continuing to talk and are optimistic an agreement as to the form and the neutral will be reached soon.

7. On February 5, 2016, the Parties agreed to a further thirty (30) day extension of time for Motorola and MetLife to respond to Plaintiff's Complaint. Motorola and MetLife's respective responses to the Complaint are now due on or before March 7, 2016.

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2 8. The Parties are optimistic that a resolution can be reached in this matter and
3 the additional time will afford the Parties the opportunity to continue their settlement opportunities
4 without incurring additional costs of litigation.

5 9. This Stipulation will not alter the date of any event or any deadline already
6 fixed by Court order.

7 10. This is the eighth extension of time sought on behalf of MetLife and the
8 seventh extension of time sought on behalf of Motorola.

9 We hereby attest that we have on file all holographic signatures corresponding to any
10 signatures indicated by a conformed signature (/s/) within this e-filed document.

11 Dated: February 8, 2016

12 /s/ Beth A. Davis
13 BETH A. DAVIS
14 Attorneys for Plaintiff
 NIA MUJADADI-TURAN

15 Dated: February 8, 2016

16 /s/ Benjamin A. Emmert
17 BENJAMIN A. EMMERT
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20 Dated: February 8, 2016

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